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*Attorney for Defendants Aric Gastwirth,
Reseller Consultants, Inc., and Ambragold, Inc.*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

CB SURETY, LLC, et al.,

Defendants,

Case No. 2:23-cv-02812-TLN-SCR

**DECLARATION OF MATTHEW
JACOBS IN SUPPORT OF THE
UNOPPOSED MOTION OF
DEFENDANTS ARIC GASTWIRTH,
RESELLER CONSULTANTS, INC., AND
AMBRAGOLD, INC. FOR A
TEMPORARY FOUR-MONTH STAY**

Hon. Troy L. Nunley

Date: December 19, 2024

Time: 2:00 p.m.

Courtroom: 2

1 I, Matthew Jacobs, declare as follows:

2 1. I have personal knowledge of the matters stated in this declaration and, if called to
3 do so, could and would competently testify thereto.

4 2. I am the founder of The Jacobs Law Firm, PC, and I represent defendants Aric
5 Gastwirth (“Gastwirth”), Reseller Consultants, Inc., and Ambragold, Inc. (together, the “Gastwirth
6 Defendants”) in the above-captioned matter.

7 3. I make this declaration in support of the Gastwirth Defendants’ Unopposed Motion
8 for a Temporary, Four-Month Stay of this action (the “Unopposed Motion”).

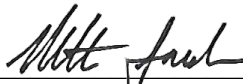
9 4. In December 2023, the United States filed a complaint against the Gastwirth
10 Defendants, the Defendants in Default (*i.e.*, defendants Travis Smith, Stephen Christopher, Bryan
11 Bass, CB Surety LLC, Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC
12 Financial Services Inc., Bass Business Consultants, and Think Processing LLC), and the Eide
13 Defendants (*i.e.*, defendants Thomas Eide and Cascade Pointe at Clemson, LLC) “to enjoin the
14 [alleged] ongoing commission of criminal wire fraud and bank fraud and conspiracy to commit
15 those offenses in violation of 18 U.S.C. §§ 1343, 1344, and 1349.” ECF 1 ¶ 1.

16 5. The Gastwirth Defendants were represented by Manny Medrano (“Prior Counsel”)
17 until September 23, 2024, when the Court entered an Order Substituting Counsel for Gastwirth
18 Defendants. ECF 89.

19 6. I was retained by the Gastwirth Defendants in or about August 2024. After being
20 retained, I diligently met and conferred on several occasions with counsel for the United States.
21 Counsel for the United States do not oppose the Gastwirth Defendants’ request for a temporary,
22 four-month stay of this action as to Gastwirth Defendants only.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Executed November 4, 2024, in Westlake Village, California

26
27 
28 Matthew Jacobs